

IN THE DISTRICT COURT OF ATOKA COUNTY
STATE OF OKLAHOMA

MICHELLE LYN SHROPSHIRE,

Plaintiff,

vs.

TEAM LAWTON TRANSPORTATION
LLC,

Defendant.

FILED
IN DISTRICT COURT
MAY 05 2022

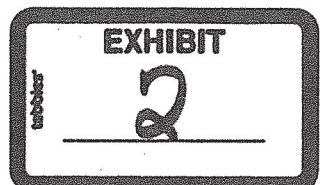
ATOKA COUNTY, OKLAHOMA
By ANGELA MUTTON, Court Clerk
Deputy

Case No. CJ-2022-22

PETITION

COMES NOW, the Plaintiff, Michelle Lyn Shropshire, by and through her attorney, Eric Grantham, of *Stipe Law Firm*, and for her cause of action against Defendant alleges and states as follows:

1. Plaintiff is a resident and citizen of Atoka County, Oklahoma.
2. Defendant Team Lawton Transportation LLC, is a foreign corporation doing business in Oklahoma.
3. The collision which is the subject matter of this litigation occurred in Atoka County, Oklahoma.
4. On May 09, 2020, a semi-trailer truck driven by Maikel Rivero Pellicier, while in the scope of his employment as an employee of Defendant Team Lawton Transportation, LLC, struck Plaintiff from behind.



5. The collision referenced in paragraph 4 was caused by the negligence of Defendant or Maikel Rivero Pellicier, acting within the scope of his employment as an employee of Team Lawton Transportation, LLC.

6. Additionally, Team Lawton Transportation, LLC, was directly negligent in its entrustment of the semi-trailer truck to Maikel Rivero Pellicier. On information and belief, Maikel Rivero Pellicier was an incompetent, reckless, careless, or unqualified driver.

7. On information and belief, Maikel Rivero Pellicier had a particular medical unfitness for the position of truck driver that was or should have been known at the time of his hiring and retention that would create an undue risk or danger of harm to third persons. Despite that substantial risk, Team Lawton Transportation, LLC, negligently hired and negligently continued to retain Maikel Rivero Pellicier as a truck driver, which resulted in injury to the Plaintiff.

8. As a result of the Defendant's negligence heretofore alleged, Plaintiff sustained bodily injuries; suffered physical impairments; has suffered and will suffer pain of mind and body; has incurred and will incur medical expenses; has been disabled; and has been disfigured, all in an amount in excess of \$75,000.00, for which damages are claimed herein.

WHEREFORE, premises considered, Plaintiff prays for judgment against Defendant in an amount in excess of \$75,000.00, together with interest, costs, and any further relief the court deems equitable, just and available to Plaintiff by law.

Respectfully submitted,



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